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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

Arizona Corporation Commission

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SEP 10 2003

AZ CORP COMMISSION
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IN THE MATTER OF ILEC UNBUNDLING
OBLIGATIONS AS A RESULT OF THE FEDERAL
TRIENNIAL REVIEW ORDER

Docket No. T-00000A-03-0369

Pursuant to the June 24, 2003 Procedural Order in this Docket, Cox Arizona Telcom, LLC ("Cox") submits the following comments.

1. What issues pertaining to the 90-day proceeding will need to be addressed as a result of the FCC's Order? Please describe any issues identified in detail.

RESPONSE: The issues that may need to be determined by the State Commissions have been identified in the FCC's Triennial Review Order ("Order"). Cox defers to the Order for those issues.

2. Please provide substantive comments on the presumptive finding of no impairment for local circuit switching on high-capacity loops such as DS-1 for business customers. These substantive comments should include any information that you believe rebuts the presumptive finding of no impairment for not providing local circuit switching as a UNE on high-capacity loops such as DS-1 for business customers.

RESPONSE: Cox does not take a position on this issue at this time.

3. If there are any other issues that the Commission must resolve within the 90-day time frame, please provide substantive comment on those issues as well.

RESPONSE: Cox has nothing to add at this time.

4. For the 90-day proceeding, what process and schedule should the Commission use to implement the FCC's Triennial Review Order, i.e., contested case process, comment and workshop process or merely a paper comment process? If you believe that a contested case process is

necessary, please identify any disputed issues of material fact that would need to be addressed in any evidentiary proceeding conducted by the Commission. Are some issues more time sensitive than others? Please identify any issues that are time sensitive and discuss your responses in detail.

RESPONSE: Cox does not take a position on this issue at this time.

5. For the issues in the 90-day proceeding, please describe what you believe is, or should be, the procedural relationship between the 90-day proceeding involving the enterprise market and the nine month proceeding for the "mass market".

RESPONSE: Cox believes that the FCC Order contains detailed information pertaining to the proceedings related to the enterprise market and those related to the mass market.

6. Are any rule changes required to the Arizona Administrative Code as a result of the FCC's Triennial Review Order? For the issues in the 90-day proceeding, are any rulemaking proceedings advisable as a result of the FCC's Triennial Review Order?

RESPONSE: Cox does not take a position on this issue at this time.

7. Please comment on any other issues related to the 90-day proceeding you believe to be relevant to the ACC's implementation of the FCC's Triennial Review Order.

RESPONSE: Cox has no comment on this at this time.

8. Should the Commission address all of the issues relating to the 90-day and 9 month proceedings within this docket?

RESPONSE: Cox has no comment on this at this time.

9. Should the Commission use the same process you identified in response to Question No. 4 in both the 90-day and nine month proceedings?

RESPONSE: Cox takes no position on this at this time.


10. Please indicate in which of the proceedings you intend to actively participate.

RESPONSE: None. Cox will monitor these proceedings and only participate to the extent necessary if Cox operations are affected.

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1 RESPECTFULLY SUBMITTED September 10, 2003.

2 COX ARIZONA TELCOM, LLC

3
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